

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Attorney Docket No. 555255-012551

| | | | |
|-----------------|------------------------------------|---|---------------------|
| Group Art Unit: | 2173 |) | |
| | |) | |
| Examiner: | Namitha Pillai |) | |
| | |) | |
| Inventor: | Jason T. Griffin |) | |
| | |) | APPEAL BRIEF |
| Serial No.: | 10/783,901 |) | |
| | |) | |
| Filed: | Feb. 20, 2004 |) | |
| | |) | |
| For: | Predictive Text Input System for a |) | |
| | Mobile Communication Device |) | |

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

This Appeal Brief is filed in response to the office action mailed April 24, 2008, which rejected claims 1-31 of this application. A Notice of Appeal and Request for Pre-Appeal Brief Conference was received by the U.S. Patent Office on July 22, 2008. A Notice of Panel Decision from Pre-Appeal Brief Review was mailed on August 21, 2008. Any fees due for filing this paper should be charged to Jones Day Deposit Account No. 501432, ref: 555255-012551.

I. Real Party in Interest

The real party in interest is Research in Motion Limited, as evidenced by the assignment recorded at Reel/Frame 014851/0528.

II. Related Appeals and Interferences

There are no related appeals or interferences to the instant application.

III. Status of Claims

Claims 1-31 are pending and have been rejected in the pending non-final office action. Prior to the issuance of the pending office action, claims 1-31 were twice rejected, once finally, and a first pre-appeal brief request for review was filed. The panel decision from the first pre-appeal brief request for review was to reopen prosecution, and the pending office action was subsequently issued. After issuance of the pending office action, a second pre-appeal brief request for review was filed. The panel decision from the second pre-appeal brief request was to maintain the rejections of claims 1-31 and instruct the applicant to proceed to the Board of Patent Appeals and Interferences.

IV. Status of Amendments

No amendments have been filed subsequent to the latest rejection.

V. Summary of Claimed Subject Matter

A. Independent Claim 1

Independent claim 1 recites a predictive text system for use with a mobile device having a reduced-key QWERTY keyboard, a display, and an alert mechanism. See, for example, the description in the specification at page 6, lines 5-8. The predictive text system further includes an ambiguous word list comprising a plurality of keystroke combinations, where each keystroke

combination represents a plurality of key selections on the reduced-key QWERTY keyboard, and where the keystroke combinations present in the ambiguous word list are associated with more than one common predicted word. An example of this subject matter may be found in the specification at page 7, line 23 to page 8, line 6.

The system further includes a predictive text system module for receiving an input keystroke combination from the reduced-key QWERTY keyboard and for determining a predicted word for the input keystroke combination. An example of such a module is described in the specification at page 7, lines 10-22. The claim further recites that the predicted word is displayed on the display of the mobile device and the predictive text system module engages the alert mechanism on the mobile device if the input keystroke combination is present in the ambiguous word list. Examples of this subject matter may be found in the specification at page 7, lines 14-17.

B. Independent Claim 18

Independent claim 18 recites a mobile device having a reduced-key QWERTY keyboard, a display, and an alert mechanism. See, for example, the description in the specification at page 5, lines 5-12 and page 6, lines 7-8. The mobile device further includes an ambiguous word list comprising a plurality of keystroke combinations, where each keystroke combination represents a plurality of key selections on the reduced-key QWERTY keyboard, and where the keystroke combinations present in the ambiguous word list are associated with more than one common predicted word. An example of this subject matter may be found in the specification at page 7, line 23 to page 8, line 6.

The mobile device also includes a predictive text system module for receiving an input keystroke combination from the reduced-key QWERTY keyboard and for determining a predicted word for the input keystroke combination, wherein the predicted word is displayed on

the display of the mobile device. An example of this subject matter may be found at page 7, lines 10-22 in the specification. Finally, claim 18 recites that the predictive text system module engages the alert mechanism on the mobile device if the input keystroke combination is present in the ambiguous word list. An example of this subject matter may be found in the specification at page 7, lines 14-17.

VI. Grounds of Rejection to Be Reviewed on Appeal

1. Whether claims 1 and 18 are unpatentable under 35 U.S.C. § 103(a) as being obvious over EP 1296216A1, application of Williams (Williams) in view of U.S. Patent No. 7,216,588, issued to Suess (Suess).
2. Whether claims 3 and 20 are unpatentable under 35 U.S.C. § 103(a) as being obvious over Williams in view of Suess.
3. Whether claims 7 and 24 are unpatentable under 35 U.S.C. § 103(a) as being obvious over Williams in view of Suess and further in view of U.S. Patent No. 5,797,098, issued to Schroeder, et al. (Schroeder).

VII. Argument

The rejection of independent claims 1 and 18 under 35 U.S.C. § 103(a) over Williams in view of Suess is improper because the cited references fail to disclose an ambiguous word list, as recited in the claims. The rejection is also improper because the cited references fail to disclose an alert, engaged if a keystroke combination is present in the ambiguous word list, as recited in the claims.

The rejection of dependent claims 3 and 20 under 35 U.S.C. § 103(a) over Williams in view of Suess is improper because the cited references fail to disclose a grammar rules database, as recited in the claims.

The rejection of dependent claims 7 and 24 under 35 U.S.C. § 103(a) over Williams in view of Suess and further in view of Schroeder is improper because the cited references fail to disclose a vibration device functioning as an alert within a predictive text system.

A. The Rejection of Claims 1 and 18 Under 35 U.S.C. § 103(a) over Williams in View of Suess Is Improper

i. The Cited References Fail to Disclose an Ambiguous Word List

In rejecting claims 1 and 18, the office action refers to page 5, table 1, and also to page 2, paragraph [0003] of Williams, and in particular lines 20-24 thereof, in support of the allegation that it discloses “*an ambiguous word list comprising a plurality of keystroke combinations, each keystroke combination representing a plurality of key selections on the reduced key QWERTY keyboard, wherein the keystroke combinations present in the ambiguous word list are associated with more than one common predicted word,*” as set forth in claim 1, for example. It is plainly evident that Table 1 of Williams, however, which is set forth below, does not disclose the claimed “ambiguous word list” as described in claims 1 and 18.



| | | | |
|-----------------|-----------|--|-----------------|
| 1 | <u>65</u> | 2 - abc | 3 - def |
| 4 - ghi | | 5 - jkl | 6 - mno |
| 7 - pqrs | | 8 - tuv | 9 - wxyz |
| * - + | <u>66</u> | 0 -  | <u>67</u> |
| | | # -  | |

Table 1. Layout of the alphanumeric keys 7.

Moreover, paragraph [0003] of Williams, set forth in its entirety below, doesn’t come close to describing this claim limitation either:

An object of the invention is to provide a mobile phone with a predictive editing program allowing more flexible text editing. This object is achieved by providing a mobile phone having a display, a keypad having a plurality of keys associated with several letters each and a further plurality

of keys, processor means controlling the display means in accordance with the operation of the keypad, a predictive editor program for generating an output containing word matching a received string of ambiguous key strokes, an editor application controlled by the processor means for editing a text based on the predictive editor programs interpretation of key strokes, and comprising means for storing strings of entered words, means for storing a sequence of key strokes, said sequence being updated upon the occurrence of a new key stroke, and being used as input to the predictive editor program, means for storing a list of matching words received from said predictive editor program, said processor means combines the text string and one word from the list of matching words for displaying in the display of at least a part of said text string and one word from the list of matching words, said one word from the list of matching words is marked in comparison to the remaining part of the text string and added to the text string upon acknowledgement by the user, and said processor means displaying a cursor marking the position at which a character can be added or deleted.

Paragraph [0003] of Williams, and in particular lines 20-24 thereof, simply do not relate to the concept of an ambiguous word list as set forth in claims 1 and 18. Rather, this portion of Williams merely states that a predictive editor program generates an output containing a word matching a received string of ambiguous key strokes and also describes an “editor application controlled by the processor means for editing a text based on the predictive editor programs interpretation of key strokes, and comprising means for storing strings of entered words, means for storing a sequence of key strokes, said sequence being updated upon the occurrence of a new key stroke...” Notably missing from this portion of Williams, however, is any mention of a list of ambiguous words, where the list comprises “*a plurality of keystroke combinations, each keystroke combination representing a plurality of key selections on the reduced key QWERTY keyboard,*” as required by claims 1 and 18 of this application.

In a further attempt to justify this clearly erroneous rejection, the office action attempts to respond to the applicant’s arguments by making the following conclusions regarding the Williams reference (without including any specific citations):

Applicant argues that Williams does not disclose an ambiguous word list. In contrast to Applicant's arguments, Williams discloses a list of matching words that represent the ambiguous word list. The list of matching words is generated in response to a sequence of keystrokes. This input of keystrokes is provided to the predictive editor program which generates a list of matching words that are associated with the sequence of keystrokes. Therefore the list represents a list of predicted words that are associated with the keystrokes. (Office Action, page 8).

The applicant submits that the Examiner's characterization of the Williams reference (as set forth above) has absolutely nothing to do with an "ambiguous word list," as claimed. The instant application very clearly defines what is meant by an "ambiguous word list," as shown in both the specification and the claim language itself. Claims 1 and 18 recite that "an ambiguous word list compris[es] a plurality of keystroke combinations, each keystroke combination representing a plurality of key selections on the reduced-key QWERTY keyboard, wherein the keystroke combinations present in the ambiguous word list are associated with more than one common predicted word." The specification similarly explains, at page 7, lines 24-25, that "the ambiguous word list sets forth a plurality of keystroke combinations that are each associated with more than one possible predicted word." The cited references do not disclose anything similar to this. However, the office action attempts to equate the claimed "ambiguous word list" with a dictionary of words used by a standard predictive editor program. The applicant submits that this interpretation completely ignores both the plain meaning of the claim terms and the clear meaning provided within the specification. For these reasons, the rejections cannot stand.

ii. The Cited References Fail to Disclose an Alert, Engaged if a Keystroke Combination Is Present in the Ambiguous Word List

The office action refers to page 3, paragraph [0022] of Williams (and in particular lines 56-58 thereof), in support of the allegation that it discloses an alert mechanism that is engaged on the mobile device if the input keystroke combination is present in the ambiguous word list. This

portion of Williams, however, which is set forth below in its entirety, only refers to highlighting letters of a word to-be-predicted as the user is typing on the telephone keypad so as to indicate to the user that the predictive editor system has not yet figured out what word is being typed, i.e., the word “has not been fixed yet.”

[0022] Data is entered on the keypad 2 which comprises of individual alphanumeric keys 7. Most of these keys 7 have multiple meanings, represented by letter, numbers and symbols printed on the keys. The entered text is shown in the display 3 of the phone. The text already entered (and accepted by the user) is shown in the same text format as the standard display format of the phone. The word presently being entered is underlined or reversed in colours in order to indicate that the letter string has not been fixed yet. The predictive editor is able to interpret individual keys and multiple key sequences in several ways simultaneously.

As described in more detail in the present application, the point of engaging the alert mechanism in the claimed invention is to point out to a user of the mobile device having a reduced-key QWERTY keyboard that the word that has been predicted may not in fact be the word that the user meant to type. Because certain keystroke combinations may not be easily discernable by the system, the alert mechanism, when combined with the appearance of the keystroke combination on the ambiguous word list, alerts the user that they may want to pay close attention to the predicted word so as to ensure the proper meaning of the entered text.

Recognizing this difference, the office action attempts to explain the rejection with the following conclusions regarding the Williams reference:

Williams discloses an alert means through which one word is marked which alerts the user to the word. This alerted word represents the keystroke combination that is matched and presented in the ambiguous word list. (Office Action, page 8).

Once again, the conclusion of the office action relies on an unreasonably broad interpretation of the claimed “ambiguous word list.” As explained above, the standard word list disclosed in Williams is not an “ambiguous word list.” Therefore, activating an alert when a word is

identified in Williams' word list is clearly not the same thing as engaging an alert mechanism when a keystroke combination is found in an "ambiguous word list." An "ambiguous word list," as explained in the patent's specification, and as clearly recited in claims 1 and 18, includes a list of keystrokes that are associated with more than one word. That is, there is no way for a predictive text program to definitively identify which word is intended by the keystrokes included in the ambiguous word list. Thus, the word list is "ambiguous" because the listed keystrokes each have more than one possible corresponding word. In contrast, Williams simply discloses a list of words that are matched to keystrokes as they are typed. There is nothing "ambiguous" about the entries in Williams' list, and thus it cannot reasonably be interpreted as an "ambiguous word list" according to the plain meaning of the term. Further, the claim term "ambiguous word list" is very specifically recited in the language of the claims and is well-defined by the specification. Thus, the Examiner's interpretation is also unduly broad in light of the claim language and specification of the instant application. Consequently, the rejections of independent claims 1 and 18 are clearly erroneous and must be withdrawn.

B. The Rejection of Claims 3 and 20 Under 35 U.S.C. § 103(a) over Williams in View of Suess Is Improper Because the Cited References Fail to Disclose a Grammar Rules Database

Claim 3 of the instant application, which depends indirectly from independent claim 1, adds the subject matter of a grammar rules database within the predictive text system. Grammar rules stored in the grammar rules database are used by the predictive text system to determine a predicted word when a particular keystroke combination results in more than one potential match. Claim 20, which depends indirectly from independent claim 18, recites subject matter analogous to that of claim 3.

The office action cites paragraph 0002, line 11 of Williams in support of the allegation that it discloses a grammar rules database. Paragraph 0002 of Williams reads:

Tegic Communications, Inc has developed an intelligent software protocol that allows the users to enter ambiguous key strokes into an electronic device. The predictive editor program, named T9®, automatically determines from all the possible matches, the intended word. The predictive editor program matches entered keystrokes with completed words from a linguistic database. This concept is subject for US 5.818.437 and WO 98/33111. The editor marks whole words at a time by displaying a box around a word to be edited and editing is only possible at the end of the marked word. In this editor, the only way to add a word between previously created words is by switching from the normal mode to a text editing mode and then selecting the word before the position where the to be added word is to be placed. Next, the to be added word is entered. The need to switch to from the normal mode to the text editing mode is cumbersome since it is a common event to need to add words into a previously created text string.

The description of the linguistic database in Williams makes clear that the linguistic database is not the same as the grammar rules database recited in claims 3 and 20. The referenced passage from Williams describes the operation of the T9 text-prediction system developed by Tegic Communications. As the passage describes, and as known in the art, the linguistic database used in the T9 system is a list of words that match a particular set of input keystrokes. The passage states that the predictive editor program “matches entered keystrokes with *completed words* from a linguistic database.” (emphasis added) In contrast, the grammar rules database recited in the claims of the instant application includes grammar rules that may be used, for example, to analyze a sentence that is being typed to try to determine the part of speech of a particular word that a user is entering. It does not contain completed words, as the database described in Williams does. An example described in the specification of the instant application is found in paragraph 28, which reads:

In step 206, the system queries the dictionary 124N.2 to determine whether there is more than one word match for the particular keystroke combination typed by the user. If there is only one word match, then

control passes to step 210. If, however, there is more than one possible match in the dictionary 124N.2, then at step 208 the system may apply grammar rules to the sentence being typed using the grammar rules database 124N.3 to make a proper selection from the plurality of possible word matches. At step 210, the system determines the predicted word based on steps 206 and 208, and at step 212 the predicted word and any alternatives to that word found on the selection list are provided to the display 122. Preferably, only the predicted word is actually displayed, but the user may access the selection list alternatives 124N.5 by engaging a particular key combination or by engaging one of the auxiliary I/O devices 128.

As this passage describes, an example system uses the grammar rules from a grammar rules database to assist in selecting the proper matching word from a plurality of possible matching words, which may be listed in a dictionary. The use of the grammar rules is intended to improve the system's ability to predict the proper word from the list of possible word matches. Williams discloses only that there is a dictionary containing "completed words." This does not in any way relate to a grammar rules database, and the difference between the Williams "linguistic database" and the claimed subject matter is made even clearer by the fact that the specification of the instant application describes how the grammar rules database may be used in conjunction with a word-containing dictionary (124N.2) that is similar to the "linguistic database" disclosed in Williams. Because Williams does not in any way describe the "linguistic database" containing grammar rules, this element from Williams cannot disclose the claimed subject matter.

For at least the reasons set forth above, neither Williams nor Suess, alone or in combination, discloses the subject matter of claims 3 and 20. Thus, the rejections of claims 3 and 20 under 35 U.S.C. § 103(a) are improper and must be withdrawn.

C. The Rejection of Claims 7 and 24 Under 35 U.S.C. § 103(a) over Williams in View of Suess and Further in View of Schroeder Is Improper Because the Cited References Fail to Disclose the Use of a Vibration Device as an Alert Within a Predictive Text System

Claim 7 of the instant application, which depends from independent claim 1, adds the subject matter of the alert mechanism within the predictive text system being a vibration device. Claim 24, which depends from independent claim 18, recites subject matter analogous to that of claim 7.

The office action rejects claims 7 and 24 as being unpatentable over Williams in view of Suess and further in view of Schroeder. Specifically, the office action admits that this subject matter is absent from the Williams and Suess references, and therefore cites column 8, lines 40-42 of Schroeder as allegedly disclosing the subject matter of claims 7 and 24. This passage from Schroeder reads, “Again, as described above, the indicator associated with a particular message type may be auditory, vibratory, visual, or a combination of the above.” The context in which Schroeder discusses the use of a vibratory alert, however, is completely unrelated to the claimed subject matter of using a vibration alert within a predictive text system. The section of Schroeder in which the cited passage appears is entitled “Distinctive Signaling.” Further, other parts of that section make clear the context in which Schroeder teaches the use of the vibratory alert. For example, at column 7, lines 63-67, Schroeder states:

In the present context, distinctive signaling is used to distinguish incoming voice calls from incoming data messages, and further to distinguish between various different possible types of data messages.

As this passage from Schroeder shows, the distinctive signaling in Schroeder is used to differentiate between an incoming voice call or data message, or between different types of incoming data messages. Nothing in Schroeder discloses the use of distinctive signaling in the context of a predictive text system. In addition, the only motivation cited in the office action for

combining Schroeder and Williams is “to efficiently alert users of the device by using vibration.” There is nothing in the references, however, to suggest combining the references, and the distinct context in which Schroeder discloses the use of vibratory alerts is wholly unrelated to the subject matter of Williams, which is directed to predictive text editing.

For at least the reasons set forth above, the office action has failed to make out a *prima facie* case of obviousness under 35 U.S.C. § 103(a). Thus, the rejections of claims 7 and 24 are improper and must be withdrawn.

VIII. Claims Appendix

A claims appendix containing a listing of the claims subject to this appeal is attached.

IX. Evidence Appendix

The Assignee submits no evidence herein under 37 C.F.R. §§ 1.130, 1.131, or 1.132, nor is there any other evidence entered by the Examiner or relied upon by the Assignee. An evidence appendix indicating “None” is attached.

X. Related Proceedings Appendix

There are no related proceedings. A related proceedings appendix indicating “None” is attached.

Respectfully submitted,

Date: _____

By: David B. Cochran

David B. Cochran, Reg. No. 39,142
Jones Day
North Point
901 Lakeside Ave.
Cleveland, OH 44114
(216) 586-1162

CLAIMS APPENDIX

1. A predictive text system for use with a mobile device having a reduced-key QWERTY keyboard, a display, and an alert mechanism, comprising:

an ambiguous word list comprising a plurality of keystroke combinations, each keystroke combination representing a plurality of key selections on the reduced-key QWERTY keyboard, wherein the keystroke combinations present in the ambiguous word list are associated with more than one common predicted word; and

a predictive text system module for receiving an input keystroke combination from the reduced-key QWERTY keyboard and for determining a predicted word for the input keystroke combination,

wherein the predicted word is displayed on the display of the mobile device; wherein the predictive text system module engages the alert mechanism on the mobile device if the input keystroke combination is present in the ambiguous word list.

2. The predictive text system of claim 1, further comprising:

a dictionary database;

wherein the predictive text system determines the predicted word by matching the input keystroke combination with one or more predicted words stored in the dictionary database.

3. The predictive text system of claim 2, further comprising:

a grammar rules database;

wherein if the predictive text system determines that there is more than one predicted word associated with the keystroke combination, it determines the predicted word by applying a set of grammar rules from the grammar rules database to the input keystroke combination.

4. The predictive text system of claim 1, further comprising:

an alerts store for storing data that causes the mobile device to engage the alert mechanism.

5. The predictive text system of claim 1, wherein the alert mechanism is a change in the colour of the predicted word on the display.

6. The predictive text system of claim 1, wherein the alert mechanism is an audible tone.

7. The predictive text system of claim 1, wherein the alert mechanism is a vibration device.

8. The predictive text system of claim 1, wherein the predicted words for each keystroke combination are organised in the ambiguous word list by frequency of occurrence in the language of the predicted words.

9. The predictive text system of claim 8, wherein the language is English.

10. The predictive text system of claim 1, further comprising:

a dictionary database containing one or more predicted words associated with a plurality of keystroke combinations; and

a grammar rules database containing a plurality of grammatical constructs that describe proper grammar in a particular language; and

wherein the predictive text system module accesses the grammar rules database to determine the most probable part of speech of the input keystroke combination, and then uses this determination to select one of the predicted words from the dictionary database.

11. The predictive text system of claim 10, wherein the dictionary database provides a word tag for each predicted word, the word tag indicating the part of speech of the predicted word.

12. The predictive text system of claim 11, wherein the predictive text system module compares the determination of the most probable part of speech to the word tags in the ambiguous word list in order to select one of the predicted words from the dictionary database.

13. The predictive text system of claim 1, further comprising:

a selection list comprising a plurality of alternative predicted words for each of a plurality of keystroke combinations; and

a data selection device for selecting information displayed on the mobile device;

wherein in response to a user activating the data selection device, the predictive text system module retrieves the alternative predicted words associated with the input keystroke combination and displays the alternative predicted words on the display.

14. The predictive text system of claim 13, wherein the data selection device is utilised by the user to select one of the alternative predicted words set forth on the display.

15. The predictive text system of claim 1, wherein the ambiguous word list is modifiable by a user of the mobile device.

16. The predictive text system of claim 13, wherein the selection list is modifiable by a user of the mobile device.

17. The predictive text system of claim 1, further comprising:

- a grammar rules database;

- wherein the predictive text system applies one or more grammatical rules from the grammar rules database to the input keystroke combination and disables the alert mechanism on the mobile device.

18. A mobile device, comprising:

- a reduced-key QWERTY keyboard;

- a display;

- an alert mechanism;

- an ambiguous word list comprising a plurality of keystroke combinations, each keystroke combination representing a plurality of key selections on the reduced-key QWERTY keyboard, wherein the keystroke combinations present in the ambiguous word list are associated with more than one common predicted word; and

a predictive text system module for receiving an input keystroke combination from the reduced-key QWERTY keyboard and for determining a predicted word for the input keystroke combination, wherein the predicted word is displayed on the display of the mobile device;

wherein the predictive text system module engages the alert mechanism on the mobile device if the input keystroke combination is present in the ambiguous word list.

19. The mobile device of claim 18, further comprising:

a dictionary database;

wherein the predictive text system determines the predicted word by matching the input keystroke combination with one or more predicted words stored in the dictionary database.

20. The mobile device of claim 19, further comprising:

a grammar rules database;

wherein if the predictive text system determines that there is more than one predicted word associated with the keystroke combination, it determines the predicted word by applying a set of grammar rules from the grammar rules database to the input keystroke combination.

21. The mobile device of claim 18, further comprising:

an alerts store for storing data that causes the mobile device to engage the alert mechanism.

22. The mobile device of claim 18, wherein the alert mechanism is a change in the colour of the predicted word on the display.

23. The mobile device of claim 18, wherein the alert mechanism is an audible tone.

24. The mobile device of claim 18, wherein the alert mechanism is a vibration device.

25. The mobile device of claim 18, wherein the predicted words for each keystroke combination are organised in the ambiguous word list by frequency of occurrence in the language of the predicted words.

26. The mobile device of claim 18, further comprising:

a dictionary database containing one or more predicted words associated with a plurality of keystroke combinations; and

a grammar rules database containing a plurality of grammatical constructs that describe proper grammar in a particular language; and

wherein the predictive text system module accesses the grammar rules database to determine the most probable part of speech of the input keystroke combination, and then uses this determination to select one of the predicted words from the dictionary database.

27. The mobile device of claim 26, wherein the dictionary database provides a word tag for each predicted word, the word tag indicating the part of speech of the predicted word.

28. The mobile device of claim 27, wherein the predictive text system module compares the determination of the most probable part of speech to the word tags in the ambiguous word list in order to select one of the predicted words from the dictionary database.

29. The mobile device of claim 18, further comprising:

a selection list comprising a plurality of alternative predicted words for each of a plurality of keystroke combinations; and

a data selection device for selecting information displayed on the mobile device;

wherein in response to a user activating the data selection device, the predictive text system module retrieves the alternative predicted words associated with the input keystroke combination and displays the alternative predicted words on the display.

30. The mobile device of claim 29, wherein the data selection device is utilised by the user to select one of the alternative predicted words set forth on the display.

31. The mobile device of claim 18, further comprising:

a grammar rules database;

wherein the predictive text system applies one or more grammatical rules from the grammar rules database to the input keystroke combination and disables the alert mechanism on the mobile device.

EVIDENCE APPENDIX

NONE

(No evidence is being submitted pursuant to 37 C.F.R. § 1.130, 1.131, or 1.132, nor is there any other evidence entered by the Examiner or relied upon by the Assignee.)

RELATED PROCEEDINGS APPENDIX

NONE

(There are no related proceedings.)